

## **EXHIBIT 4**

### **Email Exchange with the Defendants Regarding Jurisdictional Discovery**

RE: inquiry per motion for jurisdictional discovery pertaining to remand

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From: Sonneborn, Daniel R. (dsonneborn@preti.com)  
To: quickquantum@aol.com; elanders@morrisonmahoney.com; lsmith@morrisonmahoney.com  
Date: Monday, December 11, 2023 at 04:49 PM EST

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Andre,

I do not believe it is necessary to conduct jurisdictional discovery as to the Hilliard defendants.

Dan

**Daniel R. Sonneborn**  
Director  
PretiFlaherty

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**From:** Andre Bisasor <quickquantum@aol.com>  
**Sent:** Monday, December 11, 2023 4:39 PM  
**To:** Landers, Edwin <elanders@morrisonmahoney.com>; Smith, Linda <lsmith@morrisonmahoney.com>; Sonneborn, Daniel R. <DSonneborn@preti.com>  
**Subject:** Re: inquiry per motion for jurisdictional discovery pertaining to remand

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Dan,

to be clear and so there is no misunderstanding, the donais defendants stated below that they do not think jurisdictional discovery is needed from the Donais defendants. They have not taken a position on whether it is needed from the Hilliard defendants. I understand from your reply below that you agree it is not needed from the donais defendants, i.e., given the way it is worded. But it is not clear if you think it is needed from the Hilliard defendants, I ask this also in light of the fact that the Hilliard defendants are the ones who effected removal and given the dispute over when the service documents were received by Hilliard and given my challenge to the diversity of the partners/member of the Upton & Hatfield law firm.

Can you please specifically reply to clarify this?

Andre

On Monday, December 11, 2023 at 04:17:22 PM EST, Sonneborn, Daniel R. <[dsonneborn@preti.com](mailto:dsonneborn@preti.com)> wrote:

Andre,

I do not agree that it is needed and thus do not concur either. Thanks.

Dan

**Daniel R. Sonneborn**  
Director  
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Boston, MA 02109

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**From:** Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>  
**Sent:** Monday, December 11, 2023 4:15 PM  
**To:** Landers, Edwin <[elanders@morrisonmahoney.com](mailto:elanders@morrisonmahoney.com)>; Smith, Linda <[LSmith@morrisonmahoney.com](mailto:LSmith@morrisonmahoney.com)>  
**Cc:** Sonneborn, Daniel R. <[DSonneborn@preti.com](mailto:DSonneborn@preti.com)>  
**Subject:** Re: inquiry per motion for jurisdictional discovery pertaining to remand

**Note:** \*\*\* This email originated from outside of Preti. Please do not click on any links or open attachments unless you can verify the sender and content.\*\*\*

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Dan, could you please reply to my email?

Thanks,  
Andre

On Monday, December 11, 2023 at 03:37:39 PM EST, Smith, Linda <[LSmith@morrisonmahoney.com](mailto:LSmith@morrisonmahoney.com)> wrote:

The Donais Defendants do not agree that jurisdictional discovery is needed from them. To the extent you plan to file a motion seeking jurisdictional discovery from the Donais Defendants, the Donais Defendants do not concur.

**Linda Smith**

Partner

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**From:** Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>  
**Sent:** Monday, December 11, 2023 1:03 PM  
**To:** Smith, Linda <[LSmith@morrisonmahoney.com](mailto:LSmith@morrisonmahoney.com)>; Landers, Edwin <[ELanders@morrisonmahoney.com](mailto:ELanders@morrisonmahoney.com)>

**Cc:** Daniel R. Sonneborn <[dsonneborn@preti.com](mailto:dsonneborn@preti.com)>

**Subject:** Re: inquiry per motion for jurisdictional discovery pertaining to remand

External Email from Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>. Do not click on links, open attachments, or reply before confirming this is a valid email.

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***correction:***

Dear All,

Based on prior indications in **one** place or form or another, I believe you have stated or signaled (**or otherwise I believe it can be inferred**) that you do not concur with any motion for jurisdictional discovery pertaining to remand. If I am incorrect, please let me know.

Thanks,

Andre Bisasor

On Monday, December 11, 2023 at 01:01:07 PM EST, Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)> wrote:

Dear All,

Based on prior indications in place or form or another, I believe you have stated or signaled that you do not concur with any motion for jurisdictional discovery pertaining to remand. If I am incorrect, please let me know.

Thanks,

Andre Bisasor

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